

BROWN, CLARK, LE, AMES, STEDMAN & CEVALLOS LLP
Edwin B. Brown [SBN 89447] (*Pro Hac Vice*)
22342 Avenida Empresa, Suite 125
Rancho Santa Margarita, CA 92688
Phone: (949) 459-5900 Fax: (949) 713-7722
Email: edbrownlaw@gmail.com

KAPLAN COTTNER
KORY L. KAPLAN, ESQ.
Nevada Bar No. 13164
Email: kory@kaplancottner.com
850 E. Bonneville Ave.
Las Vegas, Nevada 89101
Telephone: (702) 381-8888
Facsimile: (702) 832-5559
Attorneys for Plaintiff George Jaramillo, II

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

GEORGE JARAMILLO, II, an Individual

Plaintiff,

vs.

AREA 15 LAS VEGAS LLC, a Delaware Limited
Liability Company, AREA 15 GLOBAL LLC, a
Delaware Limited Liability Company, ARNOLD
FISHER, an Individual, KENNETH FISHER, an
Individual, STEVEN FISHER, an Individual,
WINSTON FISHER, an Individual, FISHER
BROTHERS MANAGEMENT CO. LLC, a New
York Limited Liability Company, FISHER
BROTHERS FINANCIAL AND
DEVELOPMENT COMPANY LLC, a New York
Limited Liability Company, and DOES 1-50
Inclusive,

Defendants.

Case No.: 2:21-cv-00891-RFB-BNW

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND
TO DEFENDANTS' MOTION TO
DISMISS FOR LACK OF PERSONAL
JURISDICTION [ECF NO. 21] AND
MOTION TO DISMISS FOR FAILURE
TO STATE A CLAIM [ECF NO. 22]**

(FIRST REQUEST)

Plaintiff GEORGE JARAMILLO, II ("*Plaintiff*"), by and through his undersigned counsel of
record, the law firms of Brown, Clark, Le, Ames, Stedman & Cevallos LLP and Kaplan Cottner, and
Defendants AREA 15 LAS VEGAS LLC, AREA 15 GLOBAL LLC, ARNOLD FISHER ("*Arnold*"),

1 KENNETH FISHER (“*Kenneth*”), STEVEN FISHER (“*Steven*”), WINSTON FISHER (“*Winston*,”
2 and together with Arnold, Kenneth, and Steven, the “*Fisher Individuals*”), FISHER BROTHERS
3 MANAGEMENT CO. LLC, and FISHER BROTHERS FINANCIAL AND DEVELOPMENT
4 COMPANY LLC (collectively, “*Defendants*”), by and through their undersigned counsel of record,
5 the law firm of Brownstein Hyatt Farber Schreck, LLP, hereby stipulate to an extension of time for
6 Plaintiff to Respond to Defendants’ Motion to Dismiss Complaint under FRCP 12(b)(2) for Lack of
7 Personal Jurisdiction [ECF No. 21] and Defendants’ Motion to Dismiss Complaint under FRCP
8 12(b)(6) for Failure to State a Claim [ECF No. 22] (collectively, the “*Motions to Dismiss*”), as set
9 forth below:
10

11 1. On May 6, 2021, Plaintiff filed his Complaint in this Court against Defendants. *See*
12 *generally* ECF No. 1.

13 2. On August 2, 2021, Arnold, Kenneth, and Steven (and the Fisher company
14 Defendants), filed a Motion to Dismiss for Lack of Personal Jurisdiction Under FRCP 12(b)(2). *See*
15 ECF No. 21.

16 3. On August 2, 2021, all Defendants also filed a Motion to Dismiss for Failure to State a
17 Claim Under FRCP 12(b)(6). *See* ECF No. 22.

18 4. This Court may extend the deadline to respond to the Motions to Dismiss for good
19 cause. *See* FRCP 6(b)(1).

20 5. There is good cause to grant an extension of 30 days’ time to respond to the Motions
21 to Dismiss.

22 6. The parties previously entered into multiple stipulations for extensions of time for all
23 Defendants to respond to the Complaint by August 2, 2021. *See* ECF Nos. 12-14.

24 7. On August 2, 2021, Defendants filed 2 substantive Motions to Dismiss. *See* ECF No.
25 21-22.

26 8. Plaintiff seeks additional time to evaluate and analyze the arguments made in the
27 Motions to Dismiss to determine, among other things, whether it is necessary to amend the Complaint
28 or voluntarily dismiss any of Plaintiff’s claims.

1 9. Due to Plaintiff's counsel's respective calendars and need to confer on the issues, they
2 are unable to fully evaluate and analyze Defendants' arguments and confer on the issues raised by
3 Defendants' Motions to Dismiss.

4 10. The instant request is timely, as the deadline for Plaintiff to respond to the Motions to
5 Dismiss is August 16, 2021. *See* FRCP 6(b)(1)(B) (only requiring an analysis of excusable neglect
6 where extension sought after expiration of the deadline); LR IA 6-1(a) (same).

7 11. This is Plaintiff's first request for an extension of time to respond to the Motion to
8 Dismiss.

9 12. The parties make the instant request in good faith and without any intent to delay these
10 proceedings.

11 Based on the foregoing, Plaintiff and Defendants stipulate to a 30-day extension of time for
12 Defendants to respond to the Motions to Dismiss, through and including September 15, 2021.

13 DATED 11th day of August, 2021.

14 KAPLAN COTTNER

15 BROWNSTEIN HYATT FARBER SCHRECK,
16 LLP

17 BY: /s/ Kory L. Kaplan
18 KORY L. KAPLAN, ESQ.
Email: kory@kaplancottner.com

17 BY: /s/ Travis F. Chance
18 LISA HOGAN, ESQ. (admitted *pro hac vice*)
lhogan@bhfs.com
19 TRAVIS F. CHANCE, ESQ., Nevada Bar No.
13800
20 tchance@bhfs.com

21 BROWN, CLARK, LE, AMES, STEDMAN &
22 CEVALLOS LLP
Edwin B. Brown (admitted *pro hac vice*)

23 *Attorneys for Plaintiff George Jaramillo, II*

*Attorneys for Defendants Area 15 Las Vegas
LLC, Area 15 Global LLC, Arnold Fisher,
Kenneth Fisher, Steven Fisher, and Winston
Fisher, Fisher Brothers Management Co. LLC,
Fisher Brothers Financial and Development
Company LLC*

24 
25 **RICHARD E. BOULWARE, II**
26 **United States District Court**
27

28 DATED this 12th day of August, 2021.